



Katie M. Brown
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August 13, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/ Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

**Re: Annual Review of Base Rates for Fuel Costs for Duke Energy Carolinas, LLC,
Increasing Residential and Non-Residential Rates
Docket Number: 2021-3-E**

Dear Ms. Boyd:

Pursuant to S.C. Code Ann. Regs. 103-833 and 103-835, attached for filing, please find Duke Energy Carolinas, LLC's First Set of Discovery Requests to South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, which were served on August 13, 2021.

By copy of this letter we are serving the same on the parties of record.

Sincerely,

A handwritten signature in blue ink that reads "Katie M. Brown". The signature is written in a cursive, flowing style.

Katie M. Brown

Enclosure

cc: Parties of record (via email)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2021-3-E

In the Matter of:)	
)	
Annual Review of Base Rates)	DUKE ENERGY CAROLINAS, LLC'S
for Fuel Costs for)	FIRST SET OF DISCOVERY TO SOUTH
Duke Energy Carolinas, LLC, Increasing)	CAROLINA COASTAL
Residential and Non-Residential Rates)	CONSERVATION LEAGUE &
)	SOUTHERN ALLIANCE FOR CLEAN
)	ENERGY
)	

Duke Energy Carolinas, LLC (“DEC”), by and through its legal counsel, pursuant to S.C. Code Ann. Regs. §§ 103-833 and 103-835 and the South Carolina Rules of Civil Procedure (“SCRCP”), hereby serves South Carolina Coastal Conservation League and Southern Alliance for Clean Energy (“SACE/CCL”) with the following First Set of Requests for Production and Interrogatories to be answered under oath **on or before September 2, 2021.**

Please note that these Requests for Production and Interrogatories (collectively, the “Requests”) are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel should be provided to counsel for DEC through supplemental responses as soon as possible after such identification.

INSTRUCTIONS

1. Please produce the requested documents as they are kept in the usual course of business and organize and label them to correspond with the categories in the Requests. Documents attached to each other should not be separated.

2. In producing documents, furnish all documents known or available to you, regardless of whether such documents are possessed directly by you or your agents, employees, representatives, investigators, or by your attorneys. All requests for documents specifically request documents of SACE/CCL, as well as any person or entities whom you have retained to provide expert testimony in this proceeding.

3. If any document otherwise responsive to any Request was, but is no longer, in your possession, subject to your control or in existence, identify each document by listing its author(s) and addressee(s), date, subject matter, whether the document(s) or copies are still in existence (and if so, their locations and the custodians), as well as whether the document is missing or lost, has been destroyed, has been transferred voluntarily to others, or has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization.

4. If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

5. If a refusal to answer is based upon the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

6. Unless otherwise stated, the Actual Period shall be June 1, 2020 through May 21, 2021 ("Actual Period"), the Estimated Period shall be June 1, 2021 through September 30, 2021 ("Estimated Period"), and the Forecasted Period shall be October 1, 2021 through September 30, 2022 ("Forecasted Period").

7. Each Request shall be reproduced at the beginning of the response thereto.
8. Please provide copies of the information responsive to each Request in native electronic working format with all data (including source data) and formulas intact in an unprotected and unlocked form to allow auditing and verification of inputs, methods, and formulas.
9. Any inquiries or communication relating to questions concerning clarifications be directed to the undersigned.
10. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Requests any information which might otherwise be construed outside their scope.
11. Please provide responses to the Requests electronically via email to Katie.Brown2@duke-energy.com and swellborn@robinsongray.com. To the extent this is impracticable, the responses, including any responsive documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201, or some mutually convenient location otherwise agreed to by the parties, on or before September 2, 2021.

DEFINITIONS

1. **“Commission”** means the Public Service Commission of South Carolina.
2. **“Communication”** means the transmittal of information in the form of facts, ideas, documents, inquiries, or otherwise, including every discussion, conversation, conference, or telephone call.
3. **“You”** and **“your”** means SACE/CCL, SACE/CCL’s witness(es) in this proceeding, and all of its members, agents, representatives and attorneys.
4. **“Docket”** means Commission Docket No. 2021-3-E.

5. The term “**document**” is to be construed as broadly as permissible under Rule 34 of the SCRCPP and includes, but is not limited to, any written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, books, records, letters, photographs, correspondence, communications, electronic mail, text messages, social media records, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD-ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic, or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the SCRCPP of any kind in Your possession, custody or control or to which You have access or knowledge of its existence.

6. “**Identify**,” when referring to documents, means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) authors, addressees and recipients.

7. “**Identify**,” when referring to an oral Communication, means to give, to the extent known, the identity of the speaker and of each Person who was present when the Communication was spoken, and the substance, date, and place of such Communication.

8. **“Person”** means any natural person or any business, legal, or governmental entity or association.

9. The terms **“related to”** and **“relating to”** or any variation thereof shall be construed to include refer to, summarize, reflect, constitute, contain, embody, mention, show, comprise, evidence, discuss, describe, comment on, concerning, regarding, eluding to, pertaining to, probative of, in connection with, dealing with, in respect of, about, involved, identifying or proving.

INTERROGATORIES

1-1 Please provide a list of the names of the witnesses SACE/CCL intends to call and the subject matter for which each witness intends to testify for the hearing in this matter.

RESPONSE:

REQUESTS FOR PRODUCTION

1-1 Please provide all analysis, workpapers, documents, and supporting data—including, where applicable, electronic spreadsheet format with formulas intact—supporting any testimony filed by SACE/CCL in Docket No. 2021-3-E.

RESPONSE:

1-2. Please produce any and all documents identified, referred to, or relied upon in preparing your response to the Requests.

RESPONSE:

Dated this 13th day of August, 2021.

s/ Katie M. Brown

Katie M. Brown, Counsel
Duke Energy Carolinas, LLC
40 West Broad Street, Suite 690
Greenville, SC 29601

Telephone (864) 370-5045
Katie.brown2@duke-energy.com

Samuel J. Wellborn (SC Bar No. 101979)
ROBINSON GRAY STEPP & LAFFITTE, LLC
P.O. Box 11449
Columbia, SC 29211
(803) 929-1400
swellborn@robinsongray.com

Attorneys for Duke Energy Carolinas, LLC

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-3-E

In the Matter of:)
)
 Annual Review of Base Rates)
 for Fuel Costs for)
 Duke Energy Carolinas, LLC, Increasing)
 Residential and Non-Residential Rates)
 _____)

CERTIFICATE OF SERVICE

The undersigned, Lyndsay McNeely, Paralegal for Duke Energy Carolinas, LLC, does hereby certify that she has served the persons listed below with a copy of Duke Energy Carolinas, LLC's First Set of Discovery to South Carolina Coastal Conservation League and Southern Alliance for Clean Energy in the above-captioned proceedings via electronic mail on August 13, 2021.

Andrew Bateman
 Office of Regulatory Staff
abateman@ors.sc.gov

Christopher M. Huber
 Office of Regulatory Staff
chuber@ors.sc.gov

Carri Grube Lybarker
 SC Department of Consumer Affairs
clybarker@scconsumer.gov

Roger P. Hall
 SC Department of Consumer Affairs
rhall@scconsumer.gov

Heather Shirley Smith
 Duke Energy Carolinas, LLC
heather.smith@duke-energy.com

Katie M. Brown
 Duke Energy Carolinas, LLC
katie.brown2@duke-energy.com

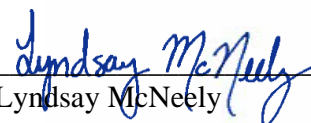
Samuel J. Wellborn
 Robinson Gray Stepp & Laffitte, LLC
swellborn@robinsongray.com

Emma C. Clancy
 Southern Environmental Law Center
eclancy@selcsc.org

Katherine Lee Mixson
 Southern Environmental Law Center
kmixson@selcsc.org

Scott Elliott
 Elliott & Elliott, P.A.
selliott@elliottlaw.us

Dated this 13th day of August, 2021.



 Lyndsay McNeely